

# EXHIBIT 3

# SEGARS\_BENCH\_v11

## Designation List Report



**Segars, Simon**

**2023-11-16**

QUALCOMM

00:04:05

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**TOTAL RUN TIME**

**00:04:05**



Documents linked to video:

27

111



**SEGARS\_BENCH\_v11**

DESIGNATION	SOURCE	DURATION	ID
148:16 - 149:09	<b>Segars, Simon 2023-11-16</b>	00:00:50	<b>SEGARS_BENCH_v11.1</b>
	148:16 (Document marked Exhibit 111		
	148:17 for identification.)		
 111.1.1	148:18 MS. DUNN: All right.		
	148:19 Q. This is an e-mail chain dated May 2021. The		
 111.1.2	148:20 subject of the e-mail is:		
	148:21 "Contact Names."		
	148:22 And I'm going to start with the bottom of		
 111.3.1	148:23 page 3. So if you look at the bottom of page 3, you		
	148:24 can see an e-mail that you sent to Mr. Amon following		
	148:25 your initial call on March 17th.		
	149:01 Do you see that?		
	149:02 A. Uh-huh.		
	149:03 Q. Okay. It starts:		
	149:04 "Hi Cristiano. Great to catch up now."		
	149:05 Do you see that?		
	149:06 A. Yes.		
	149:07 Q. Okay. Do you recall your conversation with		
	149:08 Cristiano on March 17th?		
	149:09 A. Vaguely.		
154:18 - 155:14	<b>Segars, Simon 2023-11-16</b>	00:01:34	<b>SEGARS_BENCH_v11.2</b>
	154:18 Continuing with this e-mail, you'll see that		
	154:19 after this e-mail exchange that we just discussed,		
 111.3.2	154:20 Mr. Amon writes you two more times over the course of		
	154:21 the next six weeks to secure your help in getting the		
	154:22 deal done.		
	154:23 Do you see that?		
	154:24 A. Two more times, yes.		
 111.2.1	154:25 Q. Okay. If you look at the top of page 2,		
	155:01 it's -- on April 30th, Cristiano is raising a		
	155:02 different concern. He says that:		
	155:03 "Arm is refusing to deliver IP and tools		
	155:04 covered by Qualcomm's TLA that Qualcomm had fully paid		
	155:05 for."		
	155:06 Do you see that?		
	155:07 A. Yes, I see that.		
 111.1.3	155:08 Q. Okay. And if you look at your e-mail at the		
	155:09 bottom of page 1, you write to Rene Haas and Will		
	155:10 Abbey, agreeing that Arm should not be withholding		
	155:11 technology deliverables under Qualcomm's TLA, and you		

## SEGARS\_BENCH\_v11

DESIGNATION	SOURCE	DURATION	ID
	155:12 instructed them to stop that immediately. 155:13 Do you see that? 155:14 A. Yes.		
160:13 - 160:19  Clear	<b>Segars, Simon 2023-11-16</b> 160:13 Q. Sir, you testified a moment ago that in May, 160:14 you had instructed your team to unblock the 160:15 deliverables that Qualcomm was owed under its TLA 160:16 agreement with Arm. 160:17 Do you recall that the deliverables continued 160:18 to be withheld even after you had given that 160:19 instruction?	00:00:19	<b>SEGARS_BENCH_ v11.3</b>
160:21 - 160:21	<b>Segars, Simon 2023-11-16</b> 160:21 THE WITNESS: I don't know.	00:00:06	<b>SEGARS_BENCH_ v11.4</b>
160:23 - 160:24  27.1.1	<b>Segars, Simon 2023-11-16</b> 160:23 Let's show the witness what's been previously 160:24 marked as Exhibit 27.	00:00:05	<b>SEGARS_BENCH_ v11.5</b>
161:05 - 162:04  27.2.1	<b>Segars, Simon 2023-11-16</b> 161:05 Q. This is an e-mail chain from July 14th of 161:06 2021. Directing your attention to the bottom of the 161:07 second page, where you'll find an e-mail from you to 161:08 Cristiano dated July 14, 2021. 161:09 Are you there? 161:10 A. I'm there, yes. 161:11 Q. Okay. In the second paragraph of the e-mail, 161:12 Cristiano says: 161:13 "It's disappointing that Arm has not yet 161:14 provided the necessary development deliverables 161:15 despite your assurances. The continued refusal to 161:16 provide development deliverables is now formally  27.3.1 161:17 delaying Orion, our data center chip, and CPU 161:18 validation, impacting the revenue prospects for both 161:19 companies." 161:20 Do you see that? 161:21 A. Yes. 161:22 Q. Okay. And then if you direct your attention  27.1.1 161:23 to the first page, you'll find an e-mail that you then  27.1.2 161:24 sent to Rene Haas, Paul Williamson, and Will Abbey. 161:25 And in the first sentence, you say: 162:01 "I thought we already agreed we'd unblock the	00:01:11	<b>SEGARS_BENCH_ v11.6</b>

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**SEGARS\_BENCH\_v11**

DESIGNATION	SOURCE	DURATION	ID
	162:02 deliverables they want. Please do that ASAP."		
	162:03 Do you see that?		
	162:04 A. I do.		

**QUALCOMM****00:04:05****TOTAL RUN TIME****00:04:05**

Documents linked to video:

27

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